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*Co-lead counsel in Judicial Council
Coordination Proceeding entitled California
North Bay Fire Cases, JCCP No. 4995*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER OF CO-LEAD COUNSEL TO
THE NORTH BAY FIRE CASES, JCCP
4995, ON BEHALF OF THE PROPOSED
TUBBS PREFERENCE PLAINTIFFS, TO
MOTION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
FOR RELIEF FROM AUTOMATIC STAY
TO PERMIT STATE COURT JURY
TRIAL OF 2017 TUBBS WILDFIRE
CLAIMS**

Date: July 23, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16 Floor
San Francisco, CA 94102

Michael A. Kelly, of Walkup, Melodia, Kelly & Schoenberger, and Frank M. Pitre of Cotchett, Pitre & McCarthy, LLP, in their capacity as co-lead counsel¹ in the Judicial Council Coordination Proceeding entitled California North Bay Fire Cases, JCCP No. 4995, pending in the Superior Court of California for the County of San Francisco, on behalf of Barbara Thompson, John Caslin, Elizabeth Fourkas, Phyllis Lowe, Raymond Breitenstein, Don Louis Kamprath, Raleigh Fohrman, and William Edelen (together, the “**Proposed Tubbs Preference Plaintiffs**”), hereby join the motion (the “**Motion**”) of the Official Committee of Tort Claimants (“**TCC**”) in the above-captioned chapter 11 cases of PG&E Corporation and Pacific Gas and Electric Company (collectively, the “**Debtors**”) pursuant to sections 362(d)(1) of title 11 of the United States Code sections 1334(c) and 1452(b) of title 28, Rules 4001 and 5011(b) of the Federal Rules of Bankruptcy Procedure and Rule 4004-1 of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, for entry of an order terminating the automatic stay to permit the claims of the Proposed Tubbs Preference Plaintiffs to proceed to a jury trial on their personal injury and related property damage claims against the Debtors arising from the 2017 Tubbs Fire in the Superior Court of California for the County of San Francisco, as set forth in their Complaints against the Debtors, as may be amended, and to request the Court in the California North Bay Fire Cases, JCCP 4955, to order the Tubbs Fire Claims to trial with preference pursuant to Code of Civil Procedure section 36.

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¹ The Court in JCCP 4995 appointed Mr. Kelly and Mr. Pitre co-lead counsel in Case Management Order No.1, dated March 6, 2018, attached as Exhibit A to the Declaration of Michael A. Kelly, filed contemporaneously herewith.

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The TCC supports this joinder to its Motion.

Dated: July 2, 2019

BAKER & HOSTETLER LLP

By: /s/ Robert A. Julian
Robert A. Julian

*Counsel for The Official Committee of Tort
Claimants*

WALKUP, MELODIA, KELLY &
SCHOENBERGER

By: 
Michael A. Kelly

*Co-lead counsel in North Bay Fire Cases,
JCCP No. 4995*

COTCHETT, PITRE & MCCARTHY, LLP

By: /s/ Frank M. Pitre
Frank M. Pitre

*Co-lead counsel in North Bay Fire Cases,
JCCP No. 4995*